



STEIN & NIEPORENT LLP
1441 Broadway, Suite 6090
New York, NY 10018
(212) 308-3444 Main
(212) 836-9595 Fax
www.steinllp.com

David Stein: DSTEIN@STEINLLP.COM
(admitted in NY, NJ, PA, DC, IL)

David Nieporent: DNIEPORENT@STEINLLP.COM
(admitted in NY, NJ)

April 18, 2022

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application granted. Plaintiffs shall submit their opposition papers by April 25, 2022. Defendants shall submit their reply papers by May 9, 2022.
SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ronnie Abrams", written over a horizontal line.

Hon. Ronnie Abrams
April 19, 2022

Re: Chuchuca, et al. v. Fitzcon Construction G.C. Inc., et al.
Docket No. 20-cv-2178 (RA)(JLC)

Dear Judge Abrams:

We represent the plaintiffs in the above-referenced matter, and we submit this letter in response to the Court's Order of April 14, 2022, regarding plaintiffs' overdue response to defendants' motion for summary judgment. We apologize to the Court for neglecting to timely submit our response.

Defendants' motion was originally due on February 22, 2022, with plaintiffs' opposition due on March 22; however, defendants sought and obtained several extensions from the Court (with plaintiffs' consent) because of personal issues. Plaintiffs intended to — and still intend to — oppose defendants' motion. Unfortunately, when defendants obtained their last extension, we inadvertently failed to properly calendar the second revised briefing schedule, and therefore did not finalize and file our opposition papers. Indeed, we did not even realize that we had not done so until we received the Court's Order last week, just before we closed for the Passover holiday. Plaintiffs respectfully request a brief extension, until Monday, April 25, to file their papers. (We would ask only until this Friday, April 22; however, we are short staffed this week because of Passover, and will be closed for religious observance on Friday itself.) Of course, defendants would then be entitled to a commensurate extension of time — until May 2, or whenever the Court feels is reasonable — to submit their reply papers. This alteration of the briefing schedule will not affect any other deadlines in the case, as the instant motion is the only currently pending matter.

We apologize for the inconvenience, and thank the Court for its attention to this matter. We are available at Your Honor's convenience if there are any questions regarding the foregoing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "David Stein", written over a horizontal line.

David Stein

cc: Jason R. Finkelstein, Esq. (via ECF)